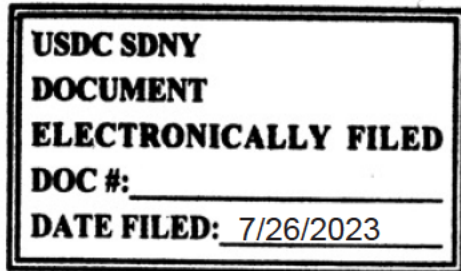


WILLKIE FARR & GALLAGHER LLP

787 Seventh Avenue
New York, NY 10019-6099
Tel: 212 728 8000
Fax: 212 728 8111



Granted.

SO ORDERED:

7/26/2023

A handwritten signature in black ink, appearing to be "R. Lehrburger", written over a horizontal line.

HON. ROBERT W. LEHRBURGER
UNITED STATES MAGISTRATE JUDGE

July 26, 2023

VIA ECF

The Honorable Robert W. Lehrburger
United States District Court
Southern District of New York
500 Pearl Street
New York, NY 10007-1312

Re: PDV USA, Inc. v. Interamerican Consulting, Inc., No: 1:20-cv-03699-JGK-RWL

Dear Judge Lehrburger:

We represent plaintiff PDV USA, Inc. ("PDV USA") in the above-captioned matter. Pursuant to Rule B.3 of the Rules for Redactions and Filing Under Seal of Your Honor's Individual Practices in Civil Cases, we submit this letter motion to file under seal information sufficient to reveal the identity of third party John Doe in (a) PDV USA's Memorandum of Law in Support of its Motion for Reconsideration (and exhibits thereto) ("Motion for Reconsideration," ECF Nos. 144, 145) and (b) any future Court filings referencing Mr. Doe.¹

Mr. Doe is a third party witness in this case and his deposition is the subject of PDV USA's Motion for Reconsideration. Mr. Doe is also a movant in a related case in the Northern District of Georgia. *See Doe v. Interamerican Consulting, Inc.*, 22-cv-04558 (N.D. Ga.). The United States District Court for the Northern District of Georgia ordered that Mr. Doe's identity remain anonymous, after Mr. Doe requested anonymity for fear of safety and/or imprisonment by non-parties to this litigation. *Id.*, ECF No. 18. On December 6, 2022, this Court entered a similar sealing order permitting Interamerican Consulting, Inc. ("Interamerican") to file a letter motion concerning Mr. Doe under seal. ECF No. 120 (the "Sealing Order"). PDV USA requests that this Court extend the Sealing Order to apply to (a) the Motion for Reconsideration and (b) any future filings in this action referencing Mr. Doe.

¹ Pursuant to Your Honor's Individual Practices, PDV USA filed a public, redacted version of the Motion for Reconsideration (ECF Nos. 142, 143), as well as a sealed, unredacted version (ECF Nos. 144, 145).

Hon. Robert W. Lehrburger

PDV USA met and conferred with counsel for Interamerican, who informed PDV USA that they have no objection to filing the Motion for Reconsideration under seal.

Respectfully submitted,

WILLKIE FARR & GALLAGHER LLP

By: /s/ Jeffrey B. Korn

Jeffrey B. Korn
Brady M. Sullivan
787 Seventh Avenue
New York, NY 10019
(212) 728-8000
JKorn@willkie.com
BSullivan@willkie.com

Michael J. Gottlieb
1875 K Street, N.W.
Washington, D.C. 20006
(202) 303-1000
MGottlieb@willkie.com

Attorneys for Plaintiff

cc: All counsel of record (by ECF)